

Koch, Kristine

From: Koch, Kristine
Sent: Wednesday, September 30, 2015 9:13 AM
To: DeMaria, Eva
Cc: Michael Allen (allenmc@cdmsmith.com); Allen, Elizabeth (allen.elizabeth@epa.gov)
Subject: RE: Ensuring PQLs are less than SLVs/PRGs

Eva – I think we should be saying that we cannot agree that sources have been adequately controlled if they are not quantitated at or below the SLV/PRG. However, you may want to add some qualifying statement that they have made progress in controlling the source or pathway if they did some action.

Let me know if you want to discuss further.

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From: DeMaria, Eva
Sent: Tuesday, September 29, 2015 3:52 PM
To: Koch, Kristine
Cc: Michael Allen (allenmc@cdmsmith.com)
Subject: Ensuring PQLs are less than SLVs/PRGs

Hi Kristine-

I just got off a conference call with CDM and they had a question regarding PQLs. In many instances, they've seen sampling in which PQLs are greater than the SLVs/PRGs. The JSCS states that in such cases, "upland parties should evaluate whether alternative sampling approaches...or alternative laboratory methods can be used to achieve the desired PQLs." They haven't seem much effort made in evaluating such alternative approaches. How important is this issue and how much do we want to push it? Thanks (also, thanks for the letter examples!).

Eva

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